UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ALFRED T. GIULIANO, CH. 7 TRUSTEE FOR THE ESTATE OF WEISMAN DISCOUNT HOME CENTERS, INC., Plaintiff/ Judgment Creditor,	:	Case No.: Misc 11-753
-against-	:	
N.B. MARBLE & GRANITE INC., Defendant/ Judgment Debtor.	:	

DECLARATION OF OKSANA G. WRIGHT

Oksana G. Wright declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am an associate with the law firm of Fox Rothschild LLP, attorneys for plaintiff Alfred T. Giuliano, Ch. 7 Trustee for the Estate of Weisman Discount Home Centers, Inc. ("the Trustee" or "plaintiff").

2. I have personal knowledge of the matters set forth below, unless otherwise noted.

3. I submit this Declaration in further support of the Trustee's Order to Show Cause against defendant, N.B. Marble & Granite Inc. ("N.B. Marble" or "defendant") seeking an Order of this Court:

(a) Compelling N.B. Marble to respond to the information subpoena served upon N.B. Marble on March 2, 2012;

(b) Requiring N.B. Marble to pay plaintiff $2,584.00 consisting of $50.00 as costs, $50.00 as a penalty and $2,484.00 in attorney's fees as damages incurred by plaintiff in attempting to effect compliance with the information subpoena and in making this motion.

4. Attached hereto as Exhibit 1 is a copy of the judgment that was entered in the United States Bankruptcy Court for the District of Delaware, Case No. 09-12741, on March 8, 2011 in

favor of plaintiff Alfred T. Giuliano, Ch. 7 Trustee for the Estate of Weisman Discount Home Centers, Inc., judgment creditor, and against N.B. Marble & Granite Inc., judgment debtor, in the total amount of $168,340.00 (the "Judgment").

5. Attached hereto as Exhibit 2 is a copy of the Judgment registration in the U.S. District Court for the Eastern District of New York.

6. Attached hereto as Exhibit 3 is a copy of the Writ of Execution, dated February 10, 2012.

7. Attached hereto as Exhibit 4 is a copy of the information subpoena that was served upon N.B. Marble on March 2, 2012.

8. Attached hereto as Exhibit 5 is a copy of the affidavit of service of the information subpoena.

9. Attached hereto as Exhibit 6 is a copy of July 5, 2012 letter sent by the Trustee's counsel to N.B. Marble.

10. Attached hereto as Exhibit 7 are time entries related to attorneys' fees incurred by plaintiff in attempting to effect compliance with the information subpoena and in making this motion.

11. I expended 9.2 hours of work on services related to effecting compliance with the information subpoena served on N.B. Marble.

12. My hourly rate is $270.00. Upon information and belief, the fees are reasonable and comparable to other attorneys in the community with similar experience.

Respectfully submitted,

Dated: November 15, 2012
New York, New York

FOX ROTHSCHILD, LLP

/s/ Oksana Wright
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